## THE FIERST LAW GROUP, P.C.

22 BAYVIEW AVENUE, SUITE 202, MANHASSET, NEW YORK 11030 (516) 586-4221

FAX: (516) 586-8536 (NOT FOR SERVICE OF PAPERS)

Timothy J. Fierst, Esq.\*

\*Admitted to Practice in New York and Connecticut

Application granted. By separate order, this action will be referred to Magistrate Judge Wang for a settlement conference. The conference scheduled for May 7, 2021 and the deadline to submit a joint letter are adjourned sine die. No later than two weeks after the settlement conference, the parties are directed to update the Court on the status of this case.

SO ORDERED

Hon. Ronnie Abrams

VIA ECF

The Honorable Ronnie Abrams United States District Judge Southern District of New York 40 Foley Square, Room 2203 New York, New York 10007

Re:

NYC Trucking Corporation d/b/a NYC Produce v. Manna Lexington Avenue LLC d/b/a Gina LaFornarina. et, al.

05/04/2021

Case No. 1:20-cv-06816

Dear Judge Abrams:

This law firm represents the plaintiff NYC Trucking Corporation d/b/a/ NYC Produce ("Plaintiff") in the referenced action. We write to Your Honor and respectfully request an adjournment of the post-discovery telephone conference scheduled for this Friday, May 7, 2021 (Dkt. 35) and an extension of time within which to submit the joint status update (Dkt. 23 para. 11) for a period of thirty (30) days. This request is being submitted with the consent of the defendants' counsel

Both the Plaintiff and Defendants have exchanged documents, responses to Interrogatories and responses to a Notice to Admit, all served pursuant to the Case Management Plan and Scheduling Order dated November 16, 2020 (the "Order"). We are genuinely hoping that due to the relatively small amount in dispute that we are able to resolve this matter. Neither party believes that it would be helpful to conduct depositions, as the parties' positions are known.

At this time, it may be beneficial for a referral of this action to a Magistrate Judge for a settlement conference. With that in mind, it is jointly requested that the post-discovery telephone conference be adjourned to enable the parties to try to resolve this action, and the deadline to file the joint status letter be extended for thirty (30) days.

Respectfully submitted,

Timothy J/Fierst

Cc: Louis Adolfsen, Esq. (VIA ECF)